



**U.S. Department of Energy**  
**Office of River Protection**

**P.O. Box 450  
Richland, Washington 99352**

03-OSR-0131

Mr. R. F. Naventi, Project Manager  
Bechtel National, Inc.  
2435 Stevens Center  
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – ACCEPTANCE OF BECHTEL NATIONAL, INC.  
(BNI) RESPONSES TO SAFETY REQUIREMENTS DOCUMENT DESIGN STANDARDS  
IMPLEMENTATION INSPECTION REPORT, IR-02-012, FINDINGS

Reference: BNI letter from R. F. Naventi to R. J. Schepens, ORP, "Bechtel National, Inc.'s  
Supplemental Response to Inspection Report IR-02-012 - Safety Requirements  
Document Design Standards Implementation," CCN 052350, dated February 27,  
2003.

This letter accepts the BNI responses to Findings IR-02-012-01a-FIN, IR-02-012-01b-FIN, and IR-  
02-012-03-FIN, transmitted by the referenced letter, based on the enclosed evaluations.

If you have any questions, please contact me, or your staff may contact Pat Carrier, WTP Safety  
Regulation Division, (509) 376-3574.

Sincerely,

Roy J. Schepens  
Manager

OSR:JLP

Enclosure

cc w/encl:  
W. R. Spezialetti, BNI

**OFFICE OF RIVER PROTECTION (ORP)  
SAFETY REQUIREMENTS DOCUMENT (SRD) DESIGN STANDARDS  
IMPLEMENTATION FINDINGS ANALYSIS  
INSPECTION REPORT IR-02-012**

**IR-02-012-01a and IR-02-012-01b-FIN**

The Contractor's responses to the Findings were acceptable. The responses addressed the issue of failure to comply with current SRD codes and standards for seismic design and analysis of piping, piping supports, vessels, and vessel supports. The Contractor recognized design standards for important-to-safety equipment covered by the SRD, must be selected, approved and used in accordance with contractual and procedural requirements. The Contractor proposed to submit two Authorization Basis Amendment Requests (ABAR) to the ORP for approval. The ABARs will add certain American Society of Mechanical Engineers section methodologies as a supplemental code to address seismic loading for the design of piping, piping supports, vessels, and vessel supports. ORP agreed the approach was appropriate.

**IR-02-012-03-FIN**

The Contractor's response to the Finding was acceptable. The response committed to "systematically implement the contractual requirements of SRD SC 4.3-6 in accordance with the Institute of Electrical and Electronics Engineers, Inc. (IEEE) 1023-1988 standard." The Contractor also committed to perform the following: (1) do a formal task analysis during ISM Cycle III in fourth quarter of 2003; (2) revise a procedure (24590-WTP-GPP-SANA-002, *Hazard Analysis, Development of Hazard Control Strategies and Identification of Standards*) by August 31, 2003; (3) provide training on the revised procedure by September 30, 2003, with emphasis on performance of a task analysis; (4) issue the Reliability, Availability, Maintainability, and Inspectability design guide to include human factors considerations by April 30, 2003; and (5) issue the Human Factors Engineering Program Implementation Plan by June 28, 2003. The ORP agreed the approach was acceptable and will follow-up on the Contractor's implementation of the IEEE 1023-1988 standard for Safety Criterion 4.3-6 in future inspections.